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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CASCADES COMPUTER INNOVATION,
LLC,

Plaintiff,

v.

RPX CORPORATION, DELL INC., LG
ELECTRONICS, INC., HTC
CORPORATION, SAMSUNG
ELECTRONICS CO. LTD., and
MOTOROLA MOBILITY, INC.,

Defendants.

Case No. 4:12-cv-01143-YGR

The Hon. Yvonne Gonzalez Rogers

**PLAINTIFF'S RESPONSE TO
CERTAIN DEFENDANTS'
"STATEMENT REGARDING THE
MOTIONS TO DISMISS AND THE
JULY 10 HEARING"**

One week before the scheduled hearing on RPX Corporation's and Dell Inc.'s separate motions to dismiss (and nearly one month after indicating that at least some defendants "expect to file motions to dismiss ... as they believe the complaint fails to state a claim" (see Dkt. No. 62)), Defendants LG Electronics, Inc., HTC Corporation, Samsung Electronics Co. Ltd., and Motorola Mobility, Inc. now combine to submit a "Statement" to the Court suggesting a delay of the hearing scheduled for July 10, 2012. (Dkt. No. 66).

The two pending motions to dismiss are fully briefed and ripe for hearing and decision. This is far better than the confusion inherent in a later, more complex consolidated hearing in which six defendants will argue complementary, but not duplicative, grounds for the dismissal of Cascades' complaint. Even Defendant Dell opposes the pending request to delay the hearing. (Dkt. No. 67).

More importantly, Cascades believes that the July 10 hearing will moot these other Defendants' efforts to dismiss Cascades' complaint based on "complementary" arguments. RPX and Dell, both sophisticated litigants with able counsel, have already raised six separate arguments between them to dismiss Cascades' complaint. Prompt resolution of these six arguments may dispose of, or at least significantly narrow, any other issues relating to Cascades' complaint that could possibly be raised by the other defendants.

Dated: July 3, 2012

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 3, 2012 the foregoing: **PLAINTIFF'S RESPONSE TO CERTAIN DEFENDANTS' "STATEMENT REGARDING THE MOTIONS TO DISMISS AND THE JULY 10 HEARING"** was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record.

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